

*Law Offices*

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Attorney for Plaintiff, Brandon Cosby

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BRANDON COSBY, : SUPERIOR COURT OF NEW JERSEY  
 : LAW DIVISION: PASSAIC COUNTY  
 : Docket No.

Plaintiff,

: Civil Action

v.

: **COMPLAINT AND JURY DEMAND**

CITY OF PATERSON, SPENCER FINCH, :  
individually and in his official capacity, :  
EDWIN MARTINEZ, individually and in his :  
official capacity, PATERSON POLICE :  
DEPARTMENT, and JOHN DOES 1-10, :  
individually and in their official capacities, :

Defendants. :

=====

Plaintiff, Brandon Cosby, by way of Complaint against Defendants, City of Paterson, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, Paterson Police Department, and John Does 1-10, says:

**THE PARTIES**

1. Plaintiff, Brandon Cosby, is an individual residing in Prospect Park, New Jersey 07508.
2. Defendant, City of Paterson is a public entity organized and existing pursuant to the laws of the State of New Jersey and has a principal place of business located at 155 Market Street, Paterson, New Jersey 07505. The City of Paterson operates and maintains a law enforcement agency known as the Paterson Police Department. The City of Paterson is under a duty to administer its policing activities in a lawful manner and in accordance with the New Jersey Constitution and the laws of the State of New Jersey.

3. Defendant, Paterson Police Department is operated under the jurisdiction of the City of Paterson and has a principal place of business located at 111 Broadway, Paterson, New Jersey 07505.
4. Defendant, Spencer Finch was at all relevant times employed as a Police Officer by Defendants City of Paterson and Paterson Police Department.
5. Defendant, Edwin Martinez was at all relevant times employed as a Police Officer by Defendants City of Paterson and Paterson Police Department.
6. Defendants, John Does 1-10 (hereinafter “John Does”), are or were at all times relevant believed to be employees of Defendants City of Paterson and/or Paterson Police Department and are believed to have participated as actors, agents, co-conspirators, and/or aiders and abettors in the wrongful conduct described herein and who thereby caused or contributed to the damages and injuries sustained by Plaintiff. These John Does also include persons who are or were agents or officials of Defendant City of Paterson. Said John Does are fictitiously named herein inasmuch as their current identities are unknown to Plaintiff at this time and are named for tolling the applicable Statute of Limitations. These fictitiously named Defendants are listed herein based upon their acts of performing overt violations of Plaintiff’s legal and civil rights. Any and all allegations against any of the specifically named Defendants should be deemed to include and list these fictitiously named Defendants automatically by reference. As the true identities of these Defendants are made known to Plaintiff, said John Does shall be designated by proper name.

**ALLEGATIONS COMMON TO ALL COUNTS**

7. On or about May 26, 2021, Plaintiff Brandon Cosby, who is African American, was lawfully inside the apartment complex located at 321 Atlantic Street in Paterson where his girlfriend's mother resided.
8. At one point, Plaintiff was standing in the hallway outside the apartment unit while his girlfriend (hereinafter "L.L.") was inside and a verbal argument ensued between the two of them mainly by phone.
9. At all times during the argument, Plaintiff was in the hallway and L.L. was inside her mother's apartment unit.
10. Defendant Police Officer Spencer Finch and Defendant Police Officer Edwin Martinez subsequently arrived on scene.
11. Police Officer Finch went inside the apartment unit to speak with L.L. and Police Officer Edwin Martinez remained in the hallway to speak with Plaintiff.
12. As Plaintiff was speaking with Officer Martinez, Officer Finch abruptly exited L.L.'s apartment unit, pushed Officer Martinez to the side, and began to violently attack Plaintiff for no apparent reason.
13. Officer Finch, in violation of departmental policy, turned off his police Body Camera in an attempt to effectuate the beating without being caught on camera.
14. Officer Finch proceeded to strike Plaintiff in the face and then attempted to bring Plaintiff to the floor by tackling him.
15. Instead of coming to aid Plaintiff from the brutal assault, Officer Martinez joined in the assault and held Plaintiff's arms and/or otherwise attempted to restrict Plaintiff from moving or defending himself from Officer Finch.

16. Officer Finch then pulled out a large solid metal flashlight and struck Plaintiff at least 14 times with the flashlight about his head while plaintiff tried to shield his head from the blows.
17. The type of solid metal flashlight utilized by Officer Finch was specifically prohibited by the Paterson Police Department as it could be used as a deadly weapon.
18. Officer Finch proceeded to brutally beat Plaintiff with the flashlight about the head and body, viciously striking him fourteen separate times.
19. As Officer Finch was striking Plaintiff with the flashlight, Officer Martinez struck Plaintiff numerous times with a closed fist and Plaintiff was brought to the ground by the two officers.
20. Officer Finch then handcuffed Plaintiff and Officer Martinez placed Plaintiff in a seated position against a wall in the hallway.
21. Once Plaintiff was sitting upright against the wall with his hands secured behind his back, Plaintiff said to Officer Finch “look me in my eye...”
22. Officer Finch then inexplicably struck Plaintiff in the face with his knee with such force that it drove Plaintiff’s head into the sheetrock wall, denting the wall with his head.
23. As a result of the attack, Plaintiff sustained serious bodily injuries, including but not limited to injuries to his head, face, mouth, shoulder and back.
24. Plaintiff was subsequently arrested without probable cause and transported to the police station.
25. Plaintiff was then falsely charged with several indictable criminal offenses including Aggravated Assault, Terroristic Threats and Resisting Arrest.
26. Officer Finch then proceeded to file a false police report claiming Plaintiff was the aggressor in order to cover up the brutal unlawful attack on Plaintiff Brandon Cosby.

27. Plaintiff Brandon Cosby had to retain counsel to defend himself against the false criminal charges that were brought against him that could have subjected him to 15 years in New Jersey State Prison if convicted.
28. Fortunately, the entire incident was captured on video by the Body Worn Camera of Police Officer Martinez, as well as the surveillance video from the apartment building.
29. The video clearly exposed the misconduct of the two police officers and the falsification of the police report.
30. Had the incident had not been captured on video, it is likely the criminal charges would have proceeded against Plaintiff Brandon Cosby while Officer Finch would have again escaped justice.
31. As a result of the video, on May 26, 2021, Police Officer Spencer Finch was charged with various crimes under Complaint Number W-2021-2099-1608, including second degree Official Misconduct, second degree Aggravated Assault, third degree Possession of a Weapon for an Unlawful Purpose, and third degree filing a False Police Report.
32. On or about, July 27, 2022, a Passaic County Grand Jury returned Indictment Number: 22-07-00836-I, a five-count indictment, against Defendant Spencer Finch. The indictment contains the original four charges contained in Complaint Number W-2021-2099-1608, as well as one additional charge, third degree Perjury.
33. Police Officer Finch has engaged in a pattern and practice of brutally assaulting minority individuals and concealing the assaults by filing or causing to be filed police reports that falsely accuse the victim of committing a crime, being the aggressor and/or resisting arrest.
34. This is evidenced by the lawsuits entitled Justin Montgomery v. Spencer Finch et al., Civil Action No.: 2:19-CV-19728; Alexis Aponte and Miguel Rivera v. Spencer Finch, et al., Civil

Action No., 2:13-CV-04007; and Donnie Watson v. Spencer Finch, et al., Civil Action No., 2:2014-CV-02137.

35. The Montgomery lawsuit alleged that on December 22, 2018, Officer Finch falsely accused Justin Montgomery, who is African American, of stealing from a deli in Paterson and then subsequently struck him in the face with a hard object which caused him to suffer a broken nose, split lip and the loss of several teeth. The lawsuit further alleges that the plaintiff was charged with various criminal offenses including robbery, resisting arrest and assault on a police officer even though the plaintiff had done nothing wrong and was not even the person that was accused of stealing by the store manager. It was further alleged that the police report that was filed against the plaintiff contained allegations that were knowingly false.
36. In or around January 2023, a Paterson Grand Jury returned Indictment No. 23-01-0039-I against Police Officer Finch regarding the incident involving Justin Montgomery. Upon information and belief, Officer Finch was charged with various criminal offenses including but not limited to Official Misconduct, Assault and Filing a False Police Report.
37. The Aponte lawsuit alleged that nine Paterson police officers, including Officer Spencer Finch, kicked, dragged, and beat a nearly unconscious suspect during an arrest that occurred on or about September 3, 2011. It was further alleged that the police officers unlawfully seized money, jewelry, and other personal belongings of the plaintiffs without returning same.
38. The Watson lawsuit alleged that Officer Spencer Finch and other police officers used excessive force during the plaintiff's arrest on November 26, 2011. It was further alleged that the officers kicked, punched, and beat the plaintiff while he was handcuffed which caused him to suffer a broken nose, fractured facial bone, broken teeth, fractured right eye orbit, impaired vision, multiple head injuries and a permanent forehead scar.

39. Defendants, City of Paterson and the Paterson Police Department, have been aware of the unlawful, discriminatory and violent behavior of Officer Finch, since at least 2011, but repeatedly failed to train, supervise, discipline, suspend, or remove Police Officer Finch.
40. Upon information and belief, Police Officer Finch is one of twelve Paterson police officers arrested since 2018. Upon information and belief, none of the arrested police officers were investigated, charged criminally or prosecuted by the Paterson Police Department.
41. Upon information and belief, the City of Paterson and Paterson Police Department knew or should have known about the unlawful, discriminatory and violent behavior of Officer Martinez, but repeatedly failed to train, supervise, discipline, suspend, or remove Police Officer Martinez.
42. Despite the fact that Officer Edwin Martinez was observed on video repeatedly striking Plaintiff, no criminal charges were ever brought against him by the Paterson Police Department.
43. Upon information and belief, Officer Edwin Martinez was not fired or suspended and no disciplinary action was ever taken against him by the City of Paterson or Paterson Police Department.
44. Defendants City of Paterson and Paterson Police Department have clearly engaged in a pattern, custom, policy and practice to permit, tolerate and/or enable the use of excessive force during arrests, as evidenced by decades of turning a blind eye toward violent, corrupt and criminal police officers.
45. On or about March 27, 2023, the Attorney General's Office was finally compelled to assume control of the Paterson Police Department. According to the Attorney General's Press Release dated March 27, 2023, the Attorney General's Office "is superseding the Paterson Police

Department, and assuming control of all police functions, including internal affairs investigations, effective immediately.” Attorney General Plakin stated that “[d]ue to a number of events and concerns relating to the Paterson Police Department, there is a crisis of confidence in law enforcement in the City of Paterson.” Id. He also stressed that he was “committed to restoring public confidence in the Paterson Police Department, which includes providing the officers on the force the support, resources, supervision, and training they need to be an exemplary police department.” Id.

46. As a direct result of the intentional and reckless conduct described herein, Plaintiff has suffered extreme physical, emotional and economic damages and injuries, all of which have been caused as a direct result of the wrongful conduct of the Defendants described herein.

**COUNT ONE**  
**(New Jersey Civil Rights Act, N.J.S.A. 10:6-1, *et seq.*)**

47. Plaintiff incorporates by reference each and every allegation made previously herein.

48. Defendants are liable to Plaintiff under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1 et seq., which creates a state law cause of action for violations of an individual’s state constitutional and statutory rights.

49. All actions alleged against Defendants were carried out under color of state law as employees, representatives and/or agents of Defendants, City of Paterson and/or Paterson Police Department.

50. Defendants are responsible to enforce the laws of the State of New Jersey and to act in accordance with said laws.

51. Defendants, Police Officer Finch and Police Officer Martinez, while acting under the color of state law, utilized excessive force to effectuate an improper and unlawful arrest of Plaintiff which resulted in serious and debilitating injuries to Plaintiff.

52. The conduct of Officer Finch and Officer Martinez constitutes a deprivation of Plaintiff's constitutional rights under the New Jersey Civil Rights Act.
53. Defendant Martinez was also present on the scene when Defendant Finch engaged in the initial use of excessive force against Plaintiff, yet Defendant Martinez failed to intervene to prevent the constitutional violation, despite having reasonable opportunity to do so.
54. The conduct of Defendant Finch, Defendant Martinez, and Defendants John Does 1-10 violated Plaintiff's constitutional rights under Article I, Paragraph 7 of the New Jersey Constitution.
55. The actions of Defendant Finch, Defendant Martinez, and Defendants John Does 1-10 were willful and malicious and without justification, and as such, these Defendants are subjected to individual liability under the New Jersey Civil Rights Act.
56. As a direct result of the intentional conduct by Defendant Finch, Defendant Martinez, and Defendants John Does 1-10 as described herein, Plaintiff has suffered extreme physical, emotional and economic damages and injuries, all of which are alleged to have been caused as a direct result of the wrongful conduct described herein.
57. At all times mentioned herein, it was the custom, policy and practice of Defendants City of Paterson and/or Paterson Police Department to permit, tolerate and/or enable the use of excessive force during arrests, particularly by Police Officer Spencer Finch who, as evidenced by the Montgomery, Aponte, and Watson lawsuits, has a lengthy history of complaints of excessive force, yet was permitted to remain an active member of the police force and upon information and belief, was not subjected to any disciplinary action.

58. Defendants City of Paterson and/or Paterson Police Department had knowledge of Police Officer Finch's use of excessive force during arrests and/or the filing of false police reports but took no action to restrain, discipline or remove him from the police force.
59. Had Defendant City of Paterson or the Paterson Police Department taken proper action to restrain, discipline, or remove Officer Finch, Plaintiff Brandon Cosby would not have been subjected to the brutal attack by Police Officer Finch and Police Officer Martinez.
60. As a direct and proximate result of the custom, policy and practice on the part of the Defendants City of Paterson and/or Paterson Police Department, Plaintiff Brandon Cosby has suffered extreme physical, emotional and economic damages and injuries, all of which are alleged to have been caused by the wrongful conduct described herein.

**WHEREFORE**, Plaintiff Brandon Cosby demands judgment jointly and severally against Defendants, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, City of Paterson, Paterson Police Department, and John Does, for compensatory damages, consequential damages, incidental damages, punitive damages, attorney's fees and costs of suit, pre and post judgment interest, and any other relief deemed by the Court to be equitable and just.

**COUNT TWO**  
**(Failure to Intervene)**

61. Plaintiff incorporates by reference each and every allegation made previously herein.
62. Defendant Martinez was present at the time Plaintiff suffered his injuries due to the use of excessive force by Officer Finch, yet failed to intervene to prevent the constitutional violation despite having reasonable opportunity to do so.

63. Defendant Martinez is liable to Plaintiff for failure to intervene pursuant to the New Jersey Civil Rights Act, N.J.S.A. 10:6-1 *et. seq.*

64. Plaintiff asserts that as a direct result of the intentional conduct described herein, he has suffered extreme physical, emotional and economic damages and injuries, all of which are alleged to have been caused as a direct result of the wrongful conduct described herein.

**WHEREFORE**, Plaintiff Brandon Cosby demands judgment jointly and severally against Defendants, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, City of Paterson, Paterson Police Department, and John Does, for compensatory damages, consequential damages, incidental damages, punitive damages, attorney's fees and costs of suit, pre and post judgment interest, and any other relief deemed by the Court to be equitable and just.

**COUNT THREE**  
**(Civil Conspiracy)**

65. Plaintiff incorporates by reference each and every allegation made previously herein.

66. Defendants Police Officer Finch, Police Officer Martinez, and John Does 1-10 engaged in a civil conspiracy to violate Plaintiff's rights under the New Jersey Constitution by conspiring to falsify the police report to cover up Defendants' actions in using excessive force during Plaintiff's unlawful arrest.

67. Defendants Police Officer Finch, Police Officer Martinez, and John Does 1-10 then took overt acts in furtherance of their conspiracy by filing a false police report and bringing false criminal charges against Plaintiff Brandon Cosby.

68. The Paterson Police Department approved the false police report and criminal charges against Plaintiff Brandon Cosby and facilitated in the filing of the false criminal charges that were issued without probable cause.

69. As a direct result of the intentional conduct described herein, Plaintiff has suffered extreme physical, emotional and economic damages and injuries, all of which are alleged to have been caused as a direct result of the wrongful conduct described herein.

**WHEREFORE**, Plaintiff Brandon Cosby demands judgment jointly and severally against Defendants, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, City of Paterson, Paterson Police Department, and John Does, for compensatory damages, consequential damages, incidental damages, punitive damages, attorney's fees and costs of suit, pre and post judgment interest, and any other relief deemed by the Court to be equitable and just.

**COUNT FOUR**  
**(New Jersey Law Against Discrimination)**

70. Plaintiff incorporates by reference each and every allegation made previously herein.

71. Pursuant to the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1, *et. seq.* (hereinafter sometimes referred to as "NJLAD") Defendants, individually and collectively, are deemed to be places of accommodation.

72. As described above, Defendants Police Officer Finch and Police Officer Martinez have engaged in a pattern of racial targeting by utilizing excessive force against African American and other minority individuals and concealing their actions by preparing and filing false police reports which accused their victims of assaulting police officers and/or resisting arrest.

73. Upon information and belief, Defendants Police Officer Finch and Police Officer Martinez have had numerous complaints of excessive force and preparing and filing false police reports directed at African American and other minority individuals without receiving any discipline, sanctions, reprimands, suspensions, or termination by Defendant City of Paterson.

74. Defendants City of Paterson and Paterson Police Department failed to institute or implement any policies or procedures regarding the use of excessive force against African American individuals.

75. Defendants City of Paterson and/or Paterson Police Department failed to provide adequate training to identify, address, remedy and/or prevent racial discrimination by Defendant Police Officer Finch and Defendant Police Officer Martinez.

76. Defendants City of Paterson and/or Paterson Police Department by their inactions, condoned, ratified and aided and abetted the discriminatory conduct perpetrated against Plaintiff in violation of the NJLAD.

77. The conduct engaged in by Defendants constitutes egregious behavior and/or willful indifference to the rights of Plaintiff, subjecting Defendants to punitive damages under the NJLAD.

78. As a direct result of the intentional conduct described herein, Plaintiff has suffered extreme physical, emotional and economic damages and injuries, all of which are alleged to have been caused as a direct result of the wrongful conduct described herein.

**WHEREFORE**, Plaintiff Brandon Cosby demands judgment jointly and severally against Defendants, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, City of Paterson, Paterson Police Department, and John Does, for compensatory damages, consequential damages, incidental damages, punitive

damages, attorney's fees and costs of suit, pre and post judgment interest, and any other relief deemed by the Court to be equitable and just.

**COUNT FIVE**  
**(Battery)**

79. Plaintiff incorporates by reference each and every allegation made previously herein.

80. At all times mentioned, Defendant Spencer Finch and Defendant Edwin Martinez were acting as police officers for the City of Paterson.

81. As described herein, Police Officer Finch and Police Officer Martinez brutally attacked Plaintiff for no apparent reason.

82. Officer Martinez repeatedly struck Plaintiff with a closed fist as Officer Finch struck him 14 times about the head and body with a large metal flashlight that was prohibited by the Paterson Police Department.

83. Once Plaintiff was brought to the ground, he was handcuffed and placed in a seated position against a wall.

84. Officer Finch then struck Plaintiff in the face with his knee with such force that it drove Plaintiff's head into the sheetrock wall, denting the wall with his head.

85. As a direct and proximate result of the attack, Plaintiff sustained serious bodily injuries, including but not limited to injuries to his head, face, mouth, shoulder and back. Plaintiff has also suffered extreme mental anguish because of Defendants' conduct.

86. At the time of the beating, Plaintiff was unarmed and was not a threat to either officer.

87. The actions of Defendant Finch and Defendant Martinez were done knowingly, willfully, and with malicious intent, and as such, Plaintiff is entitled to punitive damages.

**WHEREFORE**, Plaintiff Brandon Cosby demands judgment jointly and severally against Defendants, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, City of Paterson, Paterson Police Department, and John Does, for compensatory damages, consequential damages, incidental damages, punitive damages, attorney's fees and costs of suit, pre and post judgment interest, and any other relief deemed by the Court to be equitable and just.

**COUNT SIX**  
**(Assault)**

88. Plaintiff incorporates by reference each and every allegation made previously herein, including but not limited to Count Five.

89. Defendant Spencer Finch and Defendant Edwin Martinez intended to cause and/or did recklessly cause Plaintiff to suffer apprehension of an immediate harmful contact.

90. The actions of Defendant Finch and Defendant Martinez were done knowingly, willfully, and with malicious intent, and as such, Plaintiff is entitled to punitive damages.

**WHEREFORE**, Plaintiff Brandon Cosby demands judgment jointly and severally against Defendants, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, City of Paterson, Paterson Police Department, and John Does, for compensatory damages, consequential damages, incidental damages, punitive damages, attorney's fees and costs of suit, pre and post judgment interest, and any other relief deemed by the Court to be equitable and just.

**COUNT SEVEN**  
**(Intentional Infliction of Emotional Distress)**

91. Plaintiff incorporates by reference each and every allegation made previously herein.

92. As set forth in the preceding paragraphs, Defendant Spencer Finch and Defendant Edwin Martinez acted intentionally and maliciously when they brutally attacked Plaintiff for no apparent reason.

93. The conduct of Defendants Finch and Martinez was so outrageous in character and so extreme in degree as to fall outside the bounds of decency and is to be regarded as intolerable in the community.

94. At all relevant times, Defendants Finch and Martinez knew with substantial certainty, or should have known that severe emotional distress would be produced by their conduct.

95. By engaging in an unprovoked attack on the Plaintiff, Defendants Finch and Martinez engaged in extreme and outrageous conduct and intentionally inflicted severe emotional distress on Plaintiff.

96. Defendant Finch and Defendant Martinez also acted recklessly with extreme indifference to the value of human life when they brutally assaulted Plaintiff.

97. As a direct and proximate cause of the aforementioned conduct by Defendants Finch and Martinez, Plaintiff has suffered severe emotional distress, humiliation, embarrassment, and financial loss.

**WHEREFORE**, Plaintiff Brandon Cosby demands judgment jointly and severally against Defendants, Spencer Finch, in his capacity as Police Officer and Individually, Edwin Martinez, in his capacity as Police Officer and Individually, City of Paterson, Paterson Police Department, and John Does, for compensatory damages, consequential damages, incidental damages, punitive

damages, attorney's fees and costs of suit, pre and post judgment interest, and any other relief deemed by the Court to be equitable and just.

**DESIGNATION OF TRIAL COUNSEL**

Matthew T. Priore, Esq., is hereby designated as trial counsel on behalf of Plaintiff Brandon Cosby.

**DEMAND FOR TRIAL BY JURY**

The Plaintiff hereby demands a trial by jury with respect to all issues so triable.

**CERTIFICATION PURSUANT TO RULE 4:5-1**

I certify that the above matter is not now known by me to be the subject of any other proceeding in any other Court or tribunal. There is no other action or arbitration proceeding contemplated nor is there any other party who should be joined in this action.

I certify that each of the foregoing statements made by me is true. I am aware that if any such statement is willfully false, I am subject to punishment.

*/s/ Matthew T. Priore* \_\_\_\_\_  
MATTHEW T. PRIORE, ESQ.  
Attorney for Plaintiff, Brandon Cosby

Dated: April 25, 2023

# Civil Case Information Statement

## Case Details: PASSAIC | Civil Part Docket# L-001102-23

**Case Caption:** COSBY BRANDON VS CITY OF PATERSON  
**Case Initiation Date:** 04/25/2023  
**Attorney Name:** MATTHEW T PRIORE  
**Firm Name:** MATTHEW T. PRIORE  
**Address:** 1000 CLIFTON AVE STE 200  
CLIFTON NJ 070130000  
**Phone:** 9734700700  
**Name of Party:** PLAINTIFF : Cosby, Brandon  
**Name of Defendant's Primary Insurance Company**  
(if known): Unknown

**Case Type:** CIVIL RIGHTS  
**Document Type:** Complaint with Jury Demand  
**Jury Demand:** YES - 6 JURORS  
**Is this a professional malpractice case?** NO  
**Related cases pending:** NO  
**If yes, list docket numbers:**  
**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO  
**Does this case involve claims related to COVID-19?** NO  
**Are sexual abuse claims alleged by: Brandon Cosby?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** YES

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

04/25/2023

Dated

/s/ MATTHEW T PRIORE

Signed

